

KEVIN V. RYAN (CSBN 118321)
 United States Attorney

MARK L. KROTOSKI (CSBN 138549)
 Chief, Criminal Division

150 Almaden Avenue, Suite 900
 San Jose, California 95113
 Telephone: (408) 535-5035
 FAX: (408) 535-5081
 E-Mail: Mark. Krotoski@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

E-FILED - 8/2/06

UNITED STATES OF AMERICA,)	No. CR 05-00795-RMW
)	
Plaintiff,)	
)	STIPULATION REQUESTING
v.)	CONTINUANCE OF SENTENCING
)	HEARING AND [] ORDER
PHILIP KANG,)	
aka haul, aka 55, aka 22,)	
)	
Defendant.)	

It is hereby stipulated and agreed between defendant Philip Kang, by and through his counsel of record, L. Julius M. Turman, Esq., and Geoffrey N. Rosamond, Esq., and the United States, by and through Assistant United States Attorney Mark L. Krotoski, as follows:

1. This matter is presently set for a sentencing hearing on July 24, 2006 at 9:00 a.m.
2. The parties request further time, until September 25, 2006, to address sentencing issues.
3. The Probation Office needs further time to complete the presentence report.

// // //

// // //

STIPULATION REQUESTING CONTINUANCE OF SENTENCING HEARING AND [] ORDER
 CR 05-00795-RMW

1 For the foregoing reasons, and that the ends of justice are served by continuing this case, the
2 parties stipulate and request to a continuance of the sentencing hearing from July 24, 2006 at
3 9:00 a.m. to September 25, 2006 at 9:00 a.m., or the next available date.

4 IT IS SO STIPULATED.

5 Dated: July 18, 2006

KEVIN V. RYAN
United States Attorney

6
7
8 /s/
MARK L. KROTOSKI
Assistant United States Attorney

9 Dated: July 18, 2006

10
11 /s/
L. JULIUS M. TURMAN
GEOFFREY N. ROSAMOND
Attorneys for Defendant

12
13 IT IS SO ORDERED.

14 Upon good cause shown, the sentencing hearing is continued from July 24, 2006 at 9:00 a.m.
15 to September 25, 2006 at 9:00 a.m.

16 Dated: August 2, 2006

17 /s/ Ronald M. Whyte
RONALD M. WHYTE
United States District Judge

18
19
20 Distribute To:

21 L. Julius M. Turman, Esq.
Morgan Lewis & Bockius, LLP
22 (415) 442-1001

23 Geoffrey N. Rosamond, Esq.
McCarter English
24 100 Mulberry Street
Four Gateway Center
25 Newark, NJ 07102
FAX (973) 624-7070

26 Mark L. Krotoski
27 AUSA
150 Almaden Boulevard, Suite 900
28 San Jose, CA 95113

1 Ben Flores
2 U.S. Probation Officer
3 280 South First Street
4 San Jose, CA 95113
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28